

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DENHOLLANDER, et al.)	Lead Case No. 1:17-cv-00029-GJQ-
)	ESC and all consolidated member cases:
Plaintiffs,)	1:17-cv-00222-GJQ-ESC
)	1:17-cv-00244-GJQ-ESC
v.)	1:17-cv-00254-GJQ-ESC
)	1:17-cv-00257-GJQ-ESC
MICHIGAN STATE UNIVERSITY,)	1:17-cv-00288-GJQ-ESC
et al.,)	1:17-cv-00349-GJQ-ESC
)	1:17-cv-00676-GJQ-ESC
Defendants.)	1:17-cv-00684-GJQ-ESC
)	1:18-cv-00173-GJQ-ESC
)	1:18-cv-00174-GJQ-ESC
)	1:18-cv-00188-GJQ-ESC
)	1:18-cv-00256-GJQ-ESC
)	1:18-cv-00377-GJQ-ESC
)	1:18-cv-00385-GJQ-ESC
)	1:18-cv-00397-GJQ-ESC
)	1:18-cv-00452-GJQ-ESC
)	1:18-cv-00491-GJQ-ESC
)	1:18-cv-00494-GJQ-ESC
)	
)	Related case:
)	1:18-cv-00172-GJQ-ESC
)	1:18-cv-00433-GJQ-ESC
)	
)	
)	Hon. Gordon J. Quist

STIPULATED ORDER TO ADJOURN DEADLINES
IN LIGHT OF SETTLEMENT IN PRINCIPLE

Plaintiffs, by their undersigned attorneys, and Defendants Michigan State University, Michigan State University Board of Trustees, Michigan State University

Sports Medicine Clinic, Dr. Lou Anna K. Simon, Kathie Klages, Dr. Jeffrey Kovan, Dr. William Strampel, Dr. Gary Stollak, Dr. Douglas Dietzel, Dr. Brooke Lemmen, Destiny Teachnor-Hauk, and Kristine Moore, (collectively, the “MSU Defendants”), by their undersigned attorneys, state as follows:

The Plaintiffs and MSU in the above-captioned cases participated in continued voluntary mediation during April 25-26, 2018 and May 14-15, 2018, which resulted in the Plaintiffs and MSU reaching an agreement in principle to settle the following lead, member, and related cases as against the MSU Defendants: lead Case No. 1:17-cv-00029-GJQ-ESC; member Case Nos. 1:17-cv-00222-GJQ-ESC, 1:17-cv-00244-GJQ-ESC, 1:17-cv-00254-GJQ-ESC, 1:17-cv-00257-GJQ-ESC, 1:17-cv-00288-GJQ-ESC, 1:17-cv-00349-GJQ-ESC, 1:17-cv-00676-GJQ-ESC, 1:17-cv-00684-GJQ-ESC, 1:18-cv-00173-GJQ-ESC, 1:18-cv-00174-GJQ-ESC, 1:18-cv-00188-GJQ-ESC, 1:18-cv-00256-GJQ-ESC, 1:18-cv-00377-GJQ-ESC, 1:18-cv-00385-GJQ-ESC, 1:18-cv-00397-GJQ-ESC, 1:17-cv-00452-GJQ-ESC, 1:17-cv-00491-GJQ-ESC; 1:18-cv-00494-GJQ-ESC, and related Case Nos. 1:18-cv-00172-GJQ-ESC and 1:18-cv-00433-GJQ-ESC, (hereinafter referred to, collectively, as the “Resolved Cases”). For the avoidance of doubt, the agreement in principle does not resolve any claims in the Resolved Cases that are pending or which may be brought against defendants Lawrence Nassar, USA Gymnastics Inc., Twistars USA, Inc. d/b/a Gedderts’ Twistars Gymnastics Club USA, John Geddert, and other as yet unnamed defendants.

The Plaintiffs and MSU Defendants are actively working together to finalize the formal settlement agreement and other related paperwork for submission to this Court necessary to effectuate and implement the agreement in principle and to dismiss the claims against the MSU Defendants in the Resolved Cases. To best concentrate on their efforts in that regard, the Parties, represented by their undersigned counsel, have agreed to adjourn all deadlines by which the Plaintiffs and MSU Defendants must respond to any unresolved pleadings or motions in the Resolved Cases, pending the final resolution and dismissal with prejudice of the claims against the MSU Defendants.

Pursuant to the Parties' above stipulation, the Court enters the following Order:

1. The deadlines for the MSU Defendants to respond to any complaints to which an answer or other response has not been filed in Resolved Cases 1:18-cv-00377-GJQ-ESC, 1:18-cv-00397-GJQ-ESC, 1:18-cv-00494-GJQ-ESC, 1:18-cv-00385-GJQ-ESC, 1:18-cv-00433-GJQ-ESC, 1:18-cv-00452-GJQ-ESC, and 1:18-cv-00491-GJQ-ESC are hereby adjourned pending the final resolution and dismissal with prejudice of those cases against the MSU Defendants or until a date to be determined by the Court.

2. The deadlines for Plaintiffs to respond to any unresolved dispositive motions filed by one or more of the MSU Defendants in Resolved Cases 1:17-cv-00029-GJQ-ESC, 1:17-cv-00222-GJQ-ESC, 1:17-cv-00244-GJQ-ESC, 1:17-cv-00254-GJQ-ESC, 1:17-cv-00257-GJQ-ESC, 1:17-cv-00288-GJQ-ESC, 1:17-cv-00349-GJQ-ESC, 1:17-cv-00676-GJQ-ESC, 1:17-cv-00684-GJQ-ESC, 1:18-cv-00173-GJQ-ESC, 1:18-cv-00174-GJQ-ESC, 1:18-cv-00188-GJQ-ESC, 1:18-cv-00256-GJQ-ESC, and 1:18-cv-

00172-GJQ-ESC are hereby adjourned pending the final resolution and dismissal with prejudice of those cases against the MSU Defendants or until a date to be determined by the Court.

SO ORDERED, on this ____ day of _____, 2018

BY:

Hon. Gordon J. Quist
U.S. District Court Judge

APPROVED AS TO FORM:

<p>Manly, Stewart & Finaldi 19100 Von Karman Ave., Ste. 800 Irvine, CA 92612 (949) 252-9990</p> <p><u>/s/ John Manly (w/ permission)</u> John Manly</p> <p>Drew Cooper & Anding 80 Ottawa Ave., NW, Ste. 200 Grand Rapids, MI 49503 (616) 454-8300</p> <p><u>/s/ Stephen R. Drew (w/ permission)</u> Stephen R. Drew (P24323)</p> <p><i>Attorneys for Plaintiffs</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Related Case: 1:18-cv-00172-GJQ-ESC</p>	<p>Skadden Arps Slate Meagher & Flom LLP 155 N Wacker Dr., Ste. 2700 Chicago, IL 60606-1720 (312) 407-0700</p> <p><u>/s/ Patrick J. Fitzgerald</u> Patrick J. Fitzgerald</p> <p>Miller Canfield Paddock & Stone PLC One Michigan Ave., Ste. 900 Lansing, MI 48933 (517) 487-2070</p> <p><u>/s/ Scott R. Eldridge</u> Scott R. Eldridge (P66452)</p> <p><i>Attorneys for Defendants Michigan State University and Michigan State University Board of Trustees, and Michigan State University Sports Medicine Clinic</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Member Case Nos.: 1:17-cv-00222-GJQ-ESC 1:17-cv-00244-GJQ-ESC</p>
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	1:17-cv-00254-GJQ-ESC 1:17-cv-00257-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:17-cv-00684-GJQ-ESC 1:18-cv-00173-GJQ-ESC 1:18-cv-00174-GJQ-ESC 1:18-cv-00188-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00377-GJQ-ESC 1:18-cv-00385-GJQ-ESC 1:18-cv-00397-GJQ-ESC 1:18-cv-00452-GJQ-ESC 1:18-cv-00491-GJQ-ESC 1:18-cv-00494-GJQ-ESC Related cases: 1:18-cv-00172-GJQ-ESC 1:18-cv-00433-GJQ-ESC
ChurchWyble PC 2290 Science Parkway Okemos, MI 48864 (517) 372-1011 <u>/s/ David S. Mittleman (w/ permission)</u> David S. Mittleman (P37490) Grewal Law PLLC 2290 Science Parkway Okemos, MI 48864 (517) 393-3000 <u>/s/ Manvir S. Grewal (w/ permission)</u> Manvir S. Grewal (P48082) <i>Attorneys for Plaintiffs</i> Member Case Nos.: 1:17-cv-00222-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC	Clark Hill PLC (Grand Rapids) 200 Ottawa Ave., NW, Ste. 500 Grand Rapids, MI 49503 (616) 608-1145 <u>/s/ Steven F. Stapleton (w/ permission)</u> Steven F. Stapleton (P51571) <i>Attorneys for Defendant William Strampel</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Member Cases Nos.: 1:17-cv-00222-GJQ-ESC 1:17-cv-00244-GJQ-ESC 1:17-cv-00254-GJQ-ESC 1:17-cv-00257-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:17-cv-00684-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00385-GJQ-ESC

1:18-cv-00491-GJQ-ESC	1:18-cv-00397-GJQ-ESC 1:18-cv-00452-GJQ-ESC 1:18-cv-00491-GJQ-ESC Related cases: 1:18-cv-00172-GJQ-ESC 1:18-cv-00433-GJQ-ESC
<p>Abood Law Firm 246 E Saginaw St., Ste. 100 East Lansing, MI 48823 (517) 332-5900</p> <p><u>/s/ Andrew P. Abood (w/ permission)</u> Andrew P. Abood (P43366)</p> <p><i>Attorneys for Plaintiffs</i> Member Case Nos.: 1:17-cv-00244-GJQ-ESC 1:18-cv-00256-GJQ-ESC</p>	<p>Silver & Van Essen P.C. 300 Ottawa Ave NW Ste. 620, Grand Rapids, MI 49503 (616) 988-5600</p> <p><u>/s/ Lee T. Silver (w/ permission)</u> Lee T. Silver (P36905)</p> <p><i>Attorneys for Defendant Dr. Lou Anna K. Simon</i> Member Case No: 1:18-cv-00385-GJQ-ESC</p>
<p>Sinas Dramis Brake Boughton & McIntyre PC 3380 Pine Tree Rd. Lansing, MI 48911 (517) 394-7500</p> <p><u>/s/ James F. Graves (w/ permission)</u> James F. Graves (P14288)</p> <p><i>Attorneys for Plaintiffs</i> Member Case No.: 1:17-cv-00254-GJQ-ESC</p>	<p>Law Offices of Scott L. Feuer PC 888 W Big Beaver Rd., Ste. 850 Troy, MI 48084 (248) 723-7828</p> <p><u>/s/ Scott L. Feuer (w/ permission)</u> Scott L. Feuer (P38185)</p> <p><i>Attorneys for Defendant Gary Stollak</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Member Cases Nos.: 1:17-cv-00222-GJQ-ESC 1:17-cv-00244-GJQ-ESC 1:17-cv-00254-GJQ-ESC 1:17-cv-00257-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:17-cv-00684-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00397-GJQ-ESC</p>

	1:18-cv-00452-GJQ-ESC 1:18-cv-00491-GJQ-ESC Related cases: 1:18-cv-00172-GJQ-ESC 1:18-cv-00433-GJQ-ESC
White Law PLLC 2459 Jolly Rd., Ste. 340 Okemos, MI 48864 (517) 316-1195 <u>/s/ Alexander S. Rusek (w/ permission)</u> Alexander S. Rusek (P77581) <i>Attorneys for Plaintiffs</i> Member Case No.: 1:17-cv-00257-GJQ-ESC Related Case: 1:18-cv-00433-GJQ-ESC	Varnum Riddering Schmidt & Howlett LLP Bridgewater Place 333 Bridge St., NW P.O. Box 352 Grand Rapids, MI 49501 (616) 336-6865 <u>/s/ Bryan R. Walters (w/ permission)</u> Bryan R. Walters (P58050) <i>Attorneys for Defendant Kristine Moore</i> Member Case No: 1:17-cv-00244-GJQ-ESC 1:17-cv-00254-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:18-cv-00397-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00452-GJQ-ESC
Johnson Law PLC 10683 S. Saginaw St., Ste. D Grand Blanc, MI 48439 (810) 695-6100 <u>/s/ Thomas W. Waun (w/ permission)</u> Thomas W. Waun (P34224) <i>Attorneys for Plaintiff</i> Member Case No.: 1:17-cv-00676-GJQ-ESC	Hickey Hauck Bishoff & Jeffers, PLLC One Woodward Ave., Ste. 2000 Detroit, MI 48226 (313) 964-8600 <u>/s/ Patrick F. Hickey (w/ permission)</u> Patrick F. Hickey (P36648) <i>Attorneys for Defendants Kathie Klages, Douglas Dietzel, and Destiny Teachnor-Hauk</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Member Case No: 1:17-cv-00222-GJQ-ESC 1:17-cv-00244-GJQ-ESC 1:17-cv-00254-GJQ-ESC

	1:17-cv-00257-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:17-cv-00684-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00397-GJQ-ESC 1:18-cv-00452-GJQ-ESC 1:18-cv-00491-GJQ-ESC Related Case No: 1:18-cv-00172-GJQ-ESC 1:18-cv-00433-GJQ-ESC
McKeen & Associates, P.C. 645 Griswold St., Suite 4200 Detroit, MI 48226 (313) 961-4400 <u>/s/ Steven C. Hurbis (w/ permission)</u> Steven C. Hurbis (P80993) <i>Attorneys for Plaintiff</i> Member Case No.: 1:17-cv-00684-GJQ-ESC	Kerr Russell & Weber PLC 500 Woodward Ave., Ste. 2500 Detroit, MI 48226-3427 (313) 961-0200 <u>/s/ Fred K. Herrmann (w/ permission)</u> Fred K. Herrmann (P49519) <i>Attorneys for Defendants Dr. Brooke Lemmen and Dr. Jeffrey Kovan</i> Lead Case No.: 1:17-cv-00029-GJQ-ESC Member Cases Nos.: 1:17-cv-00222-GJQ-ESC 1:17-cv-00244-GJQ-ESC 1:17-cv-00254-GJQ-ESC 1:17-cv-00257-GJQ-ESC 1:17-cv-00288-GJQ-ESC 1:17-cv-00349-GJQ-ESC 1:18-cv-00385-GJQ-ESC 1:17-cv-00676-GJQ-ESC 1:17-cv-00684-GJQ-ESC 1:18-cv-00256-GJQ-ESC 1:18-cv-00397-GJQ-ESC 1:18-cv-00452-GJQ-ESC 1:18-cv-00491-GJQ-ESC Related cases: 1:18-cv-00172-GJQ-ESC 1:18-cv-00433-GJQ-ESC

<p>The Corey Law Firm 401 N. Main Street Royal Oak, MI 48067 (248) 548-9700</p> <p><u>/s/ Louis G. Corey (w/ permission)</u> Louis G. Corey (P34377)</p> <p><i>Attorneys for Plaintiffs</i> Member Case Nos.: 1:18-cv-00173-GJQ-ESC 1:18-cv-00174-GJQ-ESC 1:18-cv-00188-GJQ-ESC 1:18-cv-00377-GJQ-ESC 1:18-cv-00494-GJQ-ESC</p>	
<p>Sommers Schwartz PC One Towne Sq., Ste. 1700 Southfield, MI 48076 (248) 355-0300</p> <p><u>/s/ Lisa M. Esser (w/ permission)</u> Lisa M. Esser (P70628)</p> <p><i>Attorneys for Plaintiff</i> Member Case No: 1:18-cv-00397-GJQ-ESC</p>	
<p>Vandever Garzia PC 840 W Long Lake Rd., Ste. 600 Troy, MI 48098 (248) 312-2800</p> <p><u>/s/ David Q. Houbeck (w/ permission)</u> David Q. Houbeck</p> <p><i>Attorneys for Plaintiff</i> Member Case No: 1:18-cv-00385-GJQ-ESC</p>	
<p>Giroux Ratton PC 28588 Northwestern Highway, Suite 100</p>	

<p>Southfield, MI 48034 (248) 531-8665</p> <p><u>/s/ Matthew D. Klakulak (w/ permission)</u> Matthew D. Klakulak</p> <p><i>Attorneys for Plaintiff</i> Member Case No: 1:18-cv-00452-GJQ-ESC</p>	
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